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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

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U.S. DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA, : CASE NO. CR-1-02-054
Plaintiff : (Judge Dlott)
Vs. : DEFENDANT TYREESE
TYREESE DORRAN PUGH, : PUGH'S PROPOSED VOIR
Defendant : DIRE INSTRUCTIONS

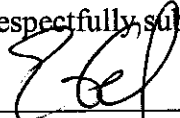
Now comes Defendant, Tyreese D. Pugh, by and through undersigned counsel,
and hereby proposes the following Voir Dire questions.

1. All questions attached hereto as Exhibit A.
2. Do you believe that police officers testimony is more credible than an non-police officer's testimony?
3. Do police officers make mistakes like everyone else?
4. Do police officers jump to conclusions, as we are all guilty of sometimes?
5. Do you understand what a "rush to judgment" is?
6. Do you promise to wait until you hear all of the evidence before deciding guilt or innocence?
7. Do you understand that the defense has to prove nothing, as the burden is on the United States to prove all elements of the crime? The Defendant is innocent as he sits here right now.

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Defendant's Proposed Voir Dire Instructions
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8. Do you understand that you may not hold the actions of the attorneys against the Defendant? Meaning that if you do not like something that the attorney did, the government must still prove its case beyond a reasonable doubt.
9. If you were a defendant, would you want yourself as a juror?
10. The Defendant has an absolute right not to take the witness stand, and you cannot hold it against him.
11. The Defense attorneys and the State's attorney may not speak jurors during the course of the trial.
12. Have you ever been falsely accused? If so, please explain the circumstances.

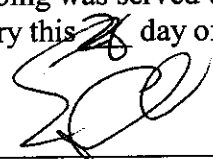
Respectfully submitted,



Edward J. Felson (0041988)
Attorney for Defendant
36 East Seventh Street, Suite 1650
Cincinnati, Ohio 45202
(513) 721-2500

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served upon the Prosecuting Attorney, by ordinary U.S. mail or hand delivery this 26 day of August, 2002.



Edward J. Felson (0041988)

COURT OF COMMON PLEAS
CRIMINAL DIVISION
HAMILTON COUNTY, OHIO

JUROR'S QUESTIONNAIRE

YOUR ANSWERS WILL BE USED SOLELY IN THE SELECTION OF A JURY AND FOR NO OTHER PURPOSE.

1. Name: _____
2. Address: _____
3. How old were you on your last birthday? _____
4. List all places where you have resided for the past 15 years indicating the length of residence at each location. _____

5. Do you own your own home, rent or share an apartment, or live with parents or other relatives? _____
6. What is your marital status? Are you recently married, divorced, separated, or have you never been married? _____
7. How far did you go in school?
Through grade school _____
High school graduate _____
Vocational school _____
Business school _____
Secretarial _____
Community College, incomplete or complete _____
4-year college incomplete _____
4-year college complete _____
Post-graduate _____
8. Only if attended a 4-year college, what was the last college you attended? _____
9. What subject(s) did you major in?
In high school _____
In college _____
In post-graduate work _____
10. What kind of work do you do? _____

11. In your job, do you have any authority in:
- 1) promotions, hiring or firing? _____
 - 2) administration? _____
 - 3) management? _____
12. Are you salaried or an hourly employee? _____
13. List all previous employers and positions held with each employer during the past 10 years and the length of time employed by each:
- _____
- _____
- _____
- _____
- _____
14. If married, what kind of work does your spouse do? What does your spouse mainly do on the job? If she or he has a job title, please indicate. If spouse does not work outside the home, please indicate. If retired, please indicate what work your spouse did.
- _____
- _____
- _____
- _____
15. Have you been in the military service? _____
16. If so, what years did you serve? _____
17. In what branch? _____
18. Were you drafted or did you enlist? _____
19. Were you involved in combat? _____ If yes, what, where and when? _____
20. Were you ever a member of the military police or shore patrol? _____
21. Has anyone in your family been killed or injured in military service? _____ If so, indicate relationship _____
22. Has anyone in your family been killed in an automobile accident? _____
23. Are you related to or close friends with any member of the Prosecutor's staff? _____

24. Are you related to or close friends with anyone who is a police officer or a member of law enforcement? _____
25. If you have children, list number, sex and age, and whether living at home. _____

26. For each child, list:
Highest level of education _____

If went to college, what if any degree did that child obtain? _____

Whether that child served in the Armed Forces _____

27. Do you like to read? _____
28. What newspapers do you subscribe to? _____
29. What sections of the newspaper do you read first? _____

30. What sections of the newspaper do you read most often? _____

31. Which magazines do you or anyone in your household subscribe to? _____

32. Which of these magazines do you read? _____

33. List the last three books which you have read. _____

34. List the last three movies which you have seen in a movie theatre. _____

35. What is the approximate number of hours per week which you devote to watching T.V.? _____
36. What is your favorite T.V. Program? _____
37. How frequently do you watch local T.V. news? _____
38. How frequently do you watch national T.V. News? _____